

REMARKS / ARGUMENTS

The present application includes pending claims 1-28, all of which have been rejected. By this Amendment, claims 1, 11, and 18 have been amended, as set forth above, to further clarify the language used in these claims and to further prosecution of the present application. The Applicant respectfully submits that the claims define patentable subject matter.

Claims 1-17 were objected because of informalities. Claims 5, 7, 15, 22, and 24 stand rejected under 35 U.S.C. § 112, 1st ¶, for allegedly failing to comply with the written description requirement. Claims 11 and 13-15 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Larsson (USPN 7,028,102). Claims 11, 13-14, and 16-17 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Andersson (Fredrik Andersson and Magnus Karlsson, "Secure Jini Services in Ad Hoc Networks," 2000). Claims 12 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Andersson. Claims 1-4, 6-7, 9-10, 18-21, 23-28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Andersson in view of Pfaffenberg (Bryan Pfaffenberg, "Dictionary of Computer Terms", ISBN: 0-02-862884-5, 1999) or alternatively over Huston (USPUB 2002/0007402). Claims 5 and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Andersson in view of Stallings (William Stallings, "Network Security Essentials: Applications and Standards", ISBN: 0130160938, 2000). Claims 1, 3, 6-7, 11-13, 18, 20, and 23-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Handelman (USPUB 2004/0016002). Claims 5 and 22 are

rejected under 35 U.S.C. § 103(a) as being unpatentable over Handelman in view of Stallings.

The Applicant respectfully traverses these rejections at least based on the following remarks.

I. Claim Objections

Claims 1-17 were objected because of informalities. The Applicant has amended independent claims 1 and 11, as set forth above, to address the claim objections stated in page 3 of the Final Office Action. The Applicant submits that the claim objections are now moot and should be withdrawn.

II. CLAIM REJECTIONS UNDER 35 U.S.C. § 112

Claims 5, 7, 15, 22, and 24 stand rejected under 35 U.S.C. § 112, 1st ¶, for allegedly failing to comply with the written description requirement. The Final Office Action states the following:

The claim(s) contains subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Applicant should provide the support for "authenticating said acquired security data prior to said searching" and "validating said acquired at least one identifier based on said previously acquired security data" in the specification or delete the newly introduced limitations.

See the Final Office Action at pages 3-4. The Applicant points out that support for "authenticating said acquired security data prior to said searching" may be located in, for example, ¶ 50 of the specification and FIG. 2A, step 215. In addition, the Applicant points out that support for "validating said acquired at least one identifier based on said previously acquired security data" may be located in, for example, ¶ 51 of the specification and FIG. 2A, steps 218-219. For example, in reference to ¶¶ 50-51, the digital certificate reads on the "at least one identifier" and the pre-established password (step 218) reads on "previously acquired security data." The Applicant submits that there is sufficient support in the specification and the figures for claims 5, 7, 15, 22, and 24. The Applicant respectfully submits that the claim rejections under 35 U.S.C. § 112, 1st ¶ are now moot and should be withdrawn.

REJECTION UNDER 35 U.S.C. § 102

III. Larsson Does Not Anticipate Claims 11 and 13-15

The Applicant first turns to the rejection of claims 11 and 13-15 under 35 U.S.C. 102(e) as being anticipated by Larsson. Without conceding that Larsson qualifies as prior art under 35 U.S.C. 102(e), the Applicant respectfully traverses this rejection as follows.

With regard to the anticipation rejections under 102(b), MPEP 2131 states that "[a] claim is anticipated only if **each and every element** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See Manual of

Patent Examining Procedure (MPEP) at 2131 (internal citation omitted). Furthermore, “[t]he identical invention must be shown in as complete detail as is contained in the ... claim.” See id. (internal citation omitted).

A. Rejection of Independent Claim 11

With regard to the rejection of independent claim 11 under Larsson, the Applicant submits that Larsson does not disclose or suggest at least the limitation of “acquiring by the node, upon said detection, security data associated with a location of previous operation of the media peripheral,” as recited by the Applicant in independent claim 11.

The Final Office Action states the following:

As per claims 11 and 13, Larsson discloses a method for establishing secure access to a media peripheral (printer 380) via a node (cell phone 100) in a communication network (10, see Fig. 1, for example). Larsson discloses detecting when the media peripheral is communicatively coupled to the node (see Fig. 11, steps 928 and associated text, for example), acquiring, upon said detection, security data (Printer Specification) associated with the media peripheral (Fig. 11, step 932/4 and associated text); and utilizing said acquired security data (step 936) to facilitate secure communication between the media peripheral and the communication network (steps 938/40 and associated, for example). Furthermore, Steps 906-914 disclosed in Fig. 11, clearly illustrate security data associated with the node used in facilitating the secure communication.

See the Final Office Action at page 5. Referring to FIG. 2 of Larsson, the Final Office Action equates the printer 380 to a “media peripheral”, and the cell phone 100 to the “node”. Referring to FIG. 9 of Larsson, the Applicant points out that in steps 932-934, the cell phone 100 simply communicates a request to the printer 380 for the printer’s specification, and the printer communicates back the requested specification. The cell

phone 100 then communicates the received printer specification to the ISP (step 936). The printer specification is subsequently used by the ISP, the print server and the print service to convert a document to a print file that is compatible for printing on the printer 380, in accordance with the printer specification. See Larsson at FIG. 9, col. 12, lines 15-57, and col. 2, lines 10-12 and 19-26. **In this regard, Larsson's printer specification (equated in the Final Office Action to Applicant's "security data") is simply used for ensuring a document is converted in a format suitable for printing on the printer 380. The printer specification, however, is not associated with any location of a previous operation of the printer 380 (equated in the Final Office Action to Applicant's "media peripheral").**

Therefore, the Applicant maintains that Larsson does not disclose or suggest at least the limitation of "acquiring by the node, upon said detection, security data associated with a location of previous operation of the media peripheral," as recited by the Applicant in independent claim 11.

Accordingly, independent claim 11 is not anticipated by Larsson and is allowable.

B. Rejection of Dependent Claims 13-15

Based on at least the foregoing, the Applicant believes the rejection of independent claim 11 under 35 U.S.C. § 102(e) as being anticipated by Larsson has been overcome and request that the rejection be withdrawn. Additionally, claims 13-15 depend from independent claim 11 and are, consequently, also respectfully submitted to be allowable.

Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 11 and 13-15.

IV. Andersson Does Not Anticipate Claims 11, 13-14, and 16-17

The Applicant now turns to the rejection of claims 11, 13-14, and 16-17 under 35 U.S.C. 102(b) as being anticipated by Andersson.

A. Rejection of Independent Claim 11

With regard to the rejection of independent claim 11 under Andersson, the Applicant submits that Andersson does not disclose or suggest at least the limitation of “acquiring by the node, upon said detection, security data associated with a location of previous operation of the media peripheral,” as recited by the Applicant in independent claim 11.

The Final Office Action states the following:

As per claim 11, Anderson discusses a client offering a service (pg. 37) registering an offered service at the Lookup Server (pg. 41) by uploading a part of the service (Marshaled Object) to the Lookup Server. (7.2.1), which reads on: "detecting when the media peripheral is communicatively coupled to the node". The security data associated with the media peripheral is acquired by the node (Lookup Server acquires Marshalled Object, which contains an instantiation of variables to use in the downloaded service-proxy, see pg. 41 and Fig. 8.1) and, as step 3 of Fig. 8.1 clearly illustrate, that the said acquired security data is utilized to facilitate secure communication between the media peripheral and the communication network. Similarly, at least step 2 in the same figure clearly illustrate that the use of security data associated with the node (without at least device identification information attempting to lookup and download service would not be able to contact the node and, as a result, the request for the service download would never reach the node).

See the Final Office Action at page 6. Referring to FIG. 7.1 (page 37) of Andersson, the Applicant points out that even if a part of the service (the marshaled object) is uploaded to the lookup server, this does not necessarily result in detecting when the media peripheral (or client) is communicatively coupled to the node (or the lookup server). **In fact, as clearly seen from FIG. 7.1, it is the service proxy that registers and uploads the marshaled object to the lookup server. Therefore, there is no disclosure that the lookup server has also performed any detection that the client is communicatively coupled to the lookup server.**

Referring to FIG. 8.1 (page 41) of Andersson, the Final Office Action equates the marshaled object to Applicant's security data. As clearly explained by Andersson, the marshaled object is instantiated variables in the proxy and an URL to the HTTP server where the proxy-code can be downloaded from. See Andersson at p. 38 (third bullet point) and p. 39 (section 7.2.3, first full ¶). Furthermore, **neither the URL nor the instantiated variables indicate (or are associated with) in any way with a location of previous operation of the client. In this regard, Andersson's marshaled object (equated in the Final Office Action to Applicant's "security data") is not associated with any location of a previous operation of the client (equated in the Final Office Action to Applicant's "media peripheral").**

Therefore, the Applicant maintains that Andersson does not disclose or suggest at least the limitation of "acquiring by the node, upon said detection, security data associated with a location of previous operation of the media peripheral," as recited by the Applicant in independent claim 11.

Accordingly, independent claim 11 is not anticipated by Andersson and is allowable.

B. Rejection of Dependent Claims 13-14 and 16-17

Based on at least the foregoing, the Applicant believes the rejection of independent claim 11 under 35 U.S.C. § 102(e) as being anticipated by Andersson has been overcome and request that the rejection be withdrawn. Additionally, claims 13-14 and 16-17 depend from independent claim 11 and are, consequently, also respectfully submitted to be allowable.

Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 11, 13-14 and 16-17.

CLAIM REJECTIONS UNDER 35 U.S.C. § 103

In order for a *prima facie* case of obviousness to be established, the Manual of Patent Examining Procedure (“MPEP”) states the following:

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine the teaching. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant’s disclosure.

See MPEP at § 2142, citing *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added). Further, MPEP § 2143.01 states that “the mere fact that references

can be combined or modified does not render the resultant combination obvious unless the prior art suggests the desirability of the combination,” and that “although a prior art device ‘may be capable of being modified to run the way the apparatus is claimed, there must be *a suggestion or motivation in the reference* to do so” (citing *In re Mills*, 916 F.2d 680, 16 USPQ 2d 1430 (Fed. Cir. 1990)). Moreover, MPEP § 2143.01 also states that the level of ordinary skill in the art cannot be relied upon to provide the suggestion...,” citing *Al-Site Corp. v. VSI Int’l Inc.*, 174 F.3d 1308, 50 USPQ 2d 1161 (Fed. Cir. 1999). Additionally, if a *prima facie* case of obviousness is not established, the Applicant is under no obligation to submit evidence of nonobviousness.

The examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness.

See MPEP at § 2142.

V. Rejection of Dependent Claims 12 and 15

Claims 12 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Andersson.

Based on at least the foregoing, the Applicant believes the rejection of independent claim 11 under 35 U.S.C. § 102(e) as being anticipated by Andersson has been overcome and request that the rejection be withdrawn. Additionally, claims 12 and 15 depend from independent claim 11 and are, consequently, also respectfully submitted to be allowable.

The Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 12 and 15.

VI. The Proposed Combination of Andersson and Pfaffenberg (or Huston) Does Not Render Claims 1-4, 6-7, 9-10, 18-21, and 23-28 Unpatentable

The Applicant now turns to the rejection of claims 1-4, 6-7, 9-10, 18-21, and 23-28 as being unpatentable over Andersson in view of Pfaffenberg (or Huston).

A. Independent Claims 1 and 18

With regard to the rejection of independent claim 1 under 35 U.S.C. § 103(a), the Applicant submits that the combination of Andersson and Pfaffenberg does not disclose or suggest at least the limitation of “searching by the node, for a previously acquired security data associated with a location of previous operation of the media peripheral,” as recited by the Applicant in independent claim 1.

The Final Office Action states the following:

Anderson does not explicitly recite: searching for previously acquired security data. However, an ordinary artisan would readily recognize that the service offered by the media peripheral are reusable (i.e. the client uses a printer more than once) and that **each time the client will want to use network resources (such as a printer) the client must have an associated at least location information (such as provided in the acquired security data) with the resources.** Furthermore, Pfaffenberg discloses the concept of storing previously used data (cache, Pfaffenberg, pg. 79-80).

See the Final Office Action at page 8 (emphasis added). The Final Office Action concedes that Andersson does not disclose any searching for previously acquired security data and then asserts obviousness based on the above bolded argument. The Applicant respectfully disagrees. Referring to FIG. 8.1, Andersson's security-model achieves its security aspect by using steps 0, 5, 6, 7, and 8. See Andersson, bottom of p. 41 and top of p. 42. More specifically, Andersson's security model utilizes signing of the proxy code and subsequent authentication of the signature utilizing a master key (fetched from the server). After the proxy code is authenticated, the proxy creates session keys, which are used for secure communication. **In this regard, even if the service (e.g., printing service) offered by a media peripheral are reusable (the Final Office Action gives an example of a printer providing printing service), the client will obtain such printing service (regardless of the location) so long as the security key protocol defined in steps 0 and 5-8 are performed, the proxy code signature is authenticated and the session keys are established. In other words, contrary to the above bolded argument, the client must not have an associated location information to use (or re-use) the printing service.**

Referring to FIG. 8.1 (page 41) of Andersson, the Final Office Action seems to equate the marshaled object to Applicant's security data. As clearly explained by Andersson, the marshaled object is instantiated variables in the proxy and an URL to the HTTP server where the proxy-code can be downloaded from. See Andersson at p. 38 (third bullet point) and p. 39 (section 7.2.3, first full ¶). Furthermore, **neither the URL nor the instantiated variables indicate (or are associated with) in any way with a location of previous operation of the client. In this regard, Andersson's**

marshaled object (equated in the Final Office Action to Applicant's "security data") is not associated with any location of a previous operation of the client (equated in the Final Office Action to Applicant's "media peripheral").

The Final Office Action also relies for support on Pfaffenberg. However, neither Pfaffenberg nor Huston overcome the above described deficiencies of ANDersson.

Therefore, the Applicant maintains that the combination of Andersson and Pfaffenberg does not disclose or suggest at least the limitation of "searching by the node, for a previously acquired security data associated with a location of previous operation of the media peripheral," as recited by the Applicant in independent claim 1. Therefore, the Applicant submits that claim 1 is allowable. Independent claim 18 is similar in many respects to the method disclosed in independent claim 1. Therefore, the Applicant submits that independent claim 18 is also allowable over the references cited in the Final Office Action at least for the reasons stated above with regard to claim 1. The Applicant respectfully submits that claims 1 and 18 are allowable. The Applicant respectfully reserves the right to argue any additional reasons, beyond those set forth above, that support the allowability of claims 1 and 18 should that need arise in the future.

B. Rejection of Dependent Claims 2-4, 6-7, 9-10, 19-21, and 23-28

Based on at least the foregoing, the Applicant believes the rejection of independent claims 1 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Andersson in view of Pfaffenberg (or Huston) has been overcome and requests that the

rejection be withdrawn. Additionally, claims 2-4, 6-7, 9-10, 19-21, and 23-28 depend from independent claims 1 and 18 and are, consequently, also respectfully submitted to be allowable.

The Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 2-4, 6-7, 9-10, 19-21, and 23-28.

VII. Rejection of Dependent Claims 5 and 22

Claims 5 and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Andersson in view of Stallings.

Based on at least the foregoing, the Applicant believes the rejection of independent claims 1 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Andersson in view of Pfaffenberg (or Huston) has been overcome and requests that the rejection be withdrawn. Stallings does not overcome the deficiencies of Andersson. Additionally, claims 5 and 22 depend from independent claims 1 and 18 and are, consequently, also respectfully submitted to be allowable.

The Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 5 and 22.

VIII. Handelman Does Not Render Claims 1, 3, 6-7, 11-13, 18, 20, and 23-24 Unpatentable

The Applicant now turns to the rejection of claims 1, 3, 6-7, 11-13, 18, 20, and 23-24 as being unpatentable over Handelman.

A. Independent Claims 1, 11 and 18

With regard to the rejection of independent claim 1 under 35 U.S.C. § 103(a), the Applicant submits that Handelman does not disclose or suggest at least the limitation of “searching by the node, for a previously acquired security data associated with a location of previous operation of the media peripheral,” as recited by the Applicant in independent claim 1.

The Final Office Action states the following:

Handelman discloses at least one processor (an system processing a client request, e.g. a system comprising headend that includes Hardware Configuration Provider Unit 70, Fig. 1 or 2) that **acquires security data (a representation of financial transaction details and/or a payment identification code that may be processed to enable billing of the user, [0095]) associated with the media peripheral (STB 45)**; said at least one processor searches for a previously acquired security data associated with a location of previous operation of the media peripheral (the headend then processes the payment identification code to bill the user [0095] clearly discloses that the headend must have some previously acquired security data corresponding to the security data. As per location, the examiner points out that in addition to some kind of address present in the previously acquired security data, which must be present for the user to receive billing data, which reads "a previously acquired security data being "associated" with a location of previous operation of the media peripheral, some kind of location of the equipment must be present in the system in order for the Hardware Configuration Provider Unit to be able to receive data).

See Final Office Action at pages 10-11 (emphasis added). The Applicant respectfully disagrees with the above argument, especially with the above bolded portion. Referring to FIGS. 1-2 of Handelman, Handelman discloses that the user indicates an agreement to pay for the circuit reconfiguration of the configurable device 60 within the STB 45.

The indication by the user includes information that enables billing of the user, such as financial transaction details and/or payment identification code (which are collectively equated by the Final Office Action to Applicant's "security information"). Obviously, such information that enables billing of the user (which is equated by the Final Office Action to Applicant's "security information") is not associated with any location of a previous operation of the STB 45 (equated by the Final Office Action to Applicant's "media peripheral"). In fact, Handelman's information that enables billing of the user is related to the user, rather than to the STB 45.

The Applicant maintains that Handelman does not disclose or suggest at least the limitation of "searching by the node, for a previously acquired security data associated with a location of previous operation of the media peripheral," as recited by the Applicant in independent claim 1.

Therefore, the Applicant submits that claim 1 is allowable. Independent claims 11 and 18 are similar in many respects to the method disclosed in independent claim 1. Therefore, the Applicant submits that independent claims 11 and 18 are also allowable over the references cited in the Final Office Action at least for the reasons stated above with regard to claim 1. The Applicant respectfully submits that claims 1, 11, and 18 are allowable. The Applicant respectfully reserves the right to argue any additional reasons, beyond those set forth above, that support the allowability of claims 1, 11, and 18 should that need arise in the future.

B. Rejection of Dependent Claims 3, 6-7, 12-13, 20, and 23-24

Based on at least the foregoing, the Applicant believes the rejection of independent claims 1, 11, and 18 under 35 U.S.C. § 103(a) as being unpatentable over Handelman has been overcome and requests that the rejection be withdrawn. Additionally, claims 3, 6-7, 12-13, 20, and 23-24 depend from independent claims 1, 11, and 18 and are, consequently, also respectfully submitted to be allowable.

The Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 3, 6-7, 12-13, 20, and 23-24.

IX. Rejection of Dependent Claims 5 and 22

Claims 5 and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Handelman in view of Stallings.

Based on at least the foregoing, the Applicant believes the rejection of independent claims 1 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Handelman has been overcome and requests that the rejection be withdrawn. Stallings does not overcome the deficiencies of Handelman. Additionally, claims 5 and 22 depend from independent claims 1 and 18 and are, consequently, also respectfully submitted to be allowable.

The Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 5 and 22.

X. INHERENCY

The Final Office Action states the following:

The limitation: "if said previously acquired security data is not found: said at least one processor exchanges information associated with the media peripheral, while the media peripheral is located in the home" is *implicit*.

(a successful transaction, which *inherently* would involve at least associating and comparing the acquired security data and the previously acquired security data, results in data being communicated to the media peripheral, e.g. [0099])

See the Final Office Action at pages 9 and 11. Initially, regardless of whether the above statements are true or not, the Applicant notes that it appears that additional claims (such as at least independent claims 1 and 18) are being rejected over Anderson-Pfaffenberg (section 22 of the Final Office Action) and over Handelman (section 28 of the Final Office Action) based on inherency.

The Applicant submits that a rejection based on inherency must include a statement of the rationale or evidence tending to show inherency. See Manual of Patent Examining Procedure at § 2112. "The fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the inherency of that result or characteristic." See *id. citing In re Rijckaert*, 9 F.3d 1531, 1534, 28 USPQ2d 1955, 1957 (Fed. Cir. 1993).

To establish inherency, the extrinsic evidence "must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. **Inherency, however, may not be established by probabilities or possibilities.** The mere fact that a certain thing may result from a given set of circumstances is not sufficient.

In re Robertson, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999). The Applicant respectfully submits that neither the cited references (such as Anderson-Pfaffenberg and Handelman) nor the Office Action “make[s] clear that the missing descriptive matter,” said to be inherent “is necessarily present in” the references cited in the Final Office Action.

A rejection based on inherency must be based on factual or technical reasoning:

In relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teaching of the applied prior art.

Ex parte Levy, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990).

The Applicant respectfully submits that the Final Office Action does not contain a basis in fact and/or technical reasoning to support the rejection based on inherency. Instead, as recited above, at least claims 1 and 18 of the present application stand rejected based on a conclusory statements of inherency or implicitness, rather than upon a “basis in fact and/or technical reasoning.” Accordingly, the Applicant respectfully submits that, absent a “basis in fact and/or technical reasoning” for the rejection of record, that rejection should be reconsidered and withdrawn.

CONCLUSION

Based on at least the foregoing, the Applicant believes that all claims 1-28 are in condition for allowance. If the Examiner disagrees, the Applicant respectfully requests a telephone interview, and request that the Examiner telephone the undersigned Attorney at (312) 775-8176.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to the deposit account of McAndrews, Held & Malloy, Ltd., Account No. 13-0017.

A Notice of Allowability is courteously solicited.

Respectfully submitted,

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/Ognyan I. Beremski/
Ognyan Beremski, Esq.
Registration No. 51,458
Attorney for Applicant

McANDREWS, HELD & MALLOY, LTD.
500 WEST MADISON STREET, 34TH FLOOR
CHICAGO, ILLINOIS 60661
(312) 775-8000